

DIRECT TESTIMONY
OF
SAMUEL S. MCCLERREN

ENGINEERING DEPARTMENT
TELECOMMUNICATIONS DIVISION
ILLINOIS COMMERCE COMMISSION

AMERITECH ILLINOIS
DOCKET NOS. 98-0252/0335 (CONSOL.)

NOVEMBER 3, 2000

Table of Contents

Witness Identification.....	1
Description of Testimony.....	2
Retail Service Quality.....	3
Historical Service Quality Standards.....	3
SBC/Ameritech Illinois' Reported Service Quality Performance.....	5
Installation Definition and SBC/Ameritech Illinois' Performance.....	7
Service Quality Penalties Made By SBC/Ameritech Illinois.....	11
Wholesale Service Quality.....	14
History of Wholesale Performance Measures.....	14
Wholesale Performance Measure Recommendation.....	17
Conclusion.....	
	19

Attachment 8.01 - Alternative Regulation Performance, 1995 - September 2000

Attachment 8.02 - Illinois Installation and Repair Field Technician Headcount

Attachment 8.03 - Out of Service > 24 Hours Problem, Chronology of Staff Efforts

Attachment 8.04 - Company's Performance At Installing Dial Tone Type Service

Attachment 8.05 - Key Wholesale Measurements

Attachment 8.06 - Key Performance Measurement Experience

Witness Identification

Q. Please state your name and business address.

A. My name is Samuel S. McClerren and my business address is 527 East Capitol Avenue, Springfield, Illinois 62701.

Q. What is your occupation?

A. I am an Economic Analyst in the Engineering Department of the Telecommunications Division of the Illinois Commerce Commission ("Commission").

Q. Please describe your professional background.

A. I am currently the Staff facilitator on the Performance Measurement Collaborative resulting from Condition #30 of Docket 98-0555, the SBC/Ameritech Illinois merger proceeding, as well as Staff facilitator on the Performance Measurement Collaborative resulting from Condition #2 of Docket 98-0866, the Bell Atlantic/GTE merger proceeding. I have provided testimony in several dockets on issues of service quality, particularly as it relates to SBC/Ameritech Illinois and the "out of service" standard. I have also been case manager in Dockets 98-0453 and 00-0596, both of which are rulemaking proceedings addressing 83 Ill. Adm. Code Part 730, Standards of Service For Local Exchange Telecommunications Carriers.

I graduated from Eastern Illinois University with a Bachelor of Arts Degree in Economics in 1976, and with a Master of Arts Degree in Economics in 1977.

In 1984, I joined the Missouri Public Service Commission ("MPSC") as a Management Auditor. In 1987, I left the MPSC to join the Illinois Commerce Commission ("Commission") as a Management Analyst. In my role as a Management Analyst, I managed telecommunications projects of Contel of Illinois, Inc., GTE North, Inc., and Illinois Bell Telephone Company ("IBT"). In April 1996, I began working in the Telecommunications Division of the Commission.

Description of Testimony

Q. What is the purpose of your testimony?

A. My testimony is divided into two major components. First, I report on various aspects of SBC/Ameritech Illinois' retail performance. Retail performance is defined as SBC/Ameritech Illinois' service quality to its own end user customers. Second, I address SBC/Ameritech Illinois' wholesale performance, which is defined as SBC/Ameritech Illinois' service quality to competitive local exchange companies ("CLECs").

For retail performance, I provide the history of how the eight service quality standards were developed in Docket 92-0448/93-0239 (Consol.), as well as the Company's reported performance on those eight service quality standards from January 1995 through September 2000. I report on an instance where SBC/Ameritech Illinois' definition of a measurement (i.e., installation) must be changed, and describe SBC/Ameritech Illinois' actual dial tone installation performance. I also describe the service quality penalties made, or to be made, by SBC/Ameritech Illinois thus far under alternative regulation and the SBC/Ameritech Illinois merger approved in Docket 98-0555.

Regarding wholesale performance, I describe events under Docket 98-0555's Condition #30, which led to a collaborative process between SBC/Ameritech Illinois, CLECs, and Staff regarding wholesale performance measures. I also describe the Company's performance on wholesale service quality standards for the past six months, and propose wholesale service quality standards for this new regulatory transition plan. I also describe the wholesale service quality penalties made, or to be made, by SBC/Ameritech Illinois thus far under the SBC/Ameritech Illinois merger approved in Docket 98-0555, and how they should be coordinated with this proceeding.

RETAIL SERVICE QUALITY

Historical Service Quality Standards

Q. How were the original service quality standards developed in Docket 92-0448/93-0239 (Consol.)?

A. In the "Commission Analysis And Conclusion" section of the original alternative regulation proceeding, the Commission stated that:

"Section 5/13-506.1(b)(6) requires the Commission to find that an alternative regulation plan will **maintain** the quality and availability of telecommunications services (emphasis added). The Commission believes that the best way to eliminate the Company's incentive to reduce service quality will be to adopt a service quality component which penalizes the Company for not maintaining service quality but does not provide additional reward for exceeding current performance. Therefore, we will adopt the Company's eight separate quality of service measures using the Company's average performance in 1990 and 1991 as performance benchmarks. Since the Company has exceeded the Commission's Part 730 rules, which are intended to be minimum standards which all LEC's must satisfy, it is

necessary to establish these higher standards to safeguard against erosion of service quality.” (Docket 92-0448/93-0239 Consol., Order, p. 58).

It is clear that the Commission intended to maintain service quality levels for the eight Part 730 measures at the Company’s performance in 1990 and 1991. Accordingly, the Company’s performance for those years was averaged, resulting in a benchmark for the eight measures. These benchmarks can be found in Attachment 8.01, which also contains the Company’s reported performance relative to the same eight measures for the months January 1995 through September 2000.

Q. Did the Commission consider providing incentives to the Company for improved performance?

A. Yes. The Company proposed the inclusion of a service quality component in the price index formula that would result in an upward adjustment if the Company improved service and would result in a downward adjustment if service deteriorated. (Order at p. 56).

Q. What was the Commission’s determination on providing incentives?

A. As stated in the Order language quoted above, the Commission believed that the best way to eliminate the Company’s incentive to reduce service quality would be to adopt a service quality component which penalizes the Company for not maintaining service quality but does not provide additional reward for exceeding current performance.

Q. Has anything changed that would lead you to recommend that service quality incentives should be considered in this proceeding, as recommended by Company witness Gebhardt?

A. No. The Commission's reliance on Section 13-506(b)(1) to find that an alternative regulation plan should maintain service quality levels remains valid. The question to be addressed in this proceeding is what penalties should be established to motivate the Company to maintain service quality, since the current penalties have not succeeded in that task.

SBC/Ameritech Illinois' Reported Service Quality Performance

Q. How would you describe the Company's reported service quality since the January 1995 time frame?

A. In a word, exasperating. Consider the following about SBC/Ameritech Illinois' performance relative to the "Percent Out of Service > 24 Hours" measure:

?? The Company missed the "Percent Out of Service > 24 Hours" standard 10 times in 1995, 12 times in 1996, 12 times in 1997, 11 times in 1998, 3 times in 1999, and 4 times through September 2000.

?? The Staff has met with Company representatives for years to try to resolve the out of service problem. Nevertheless, and in spite of this Commission's increased attention to the issue and the Company's promises to the contrary, the Company has reduced installation and repair technician staffing levels, as shown in

Attachment 8.02. From August 1998 through January 2000, when most of the technician headcount decline occurred, there were several meetings between Staff and Company representatives in which increases in technician headcount were promised by the Company.

?? In spite of frequent meetings with Company personnel, docketed proceedings, increased penalties, and repeated commitments from the Company to improve performance, highlights of which are in Attachment 8.03, SBC/Ameritech Illinois' out of service problem is at the highest (worst) point in the history of the current alternative regulation plan. For the month of September 2000, the Company reports an out of service rate of 37.0% (see Attachment 8.01), over seven times the allowed rate per Code Part 730 and the current alternative regulation plan.

The Company's installation performance has also been unsatisfactory. The Company reports that it missed installation performance for four months in 1996 and one month in 1999. The Company has had problems reporting information accurately (e.g., the installation performance for calendar year 1999 was restated in June 2000), and, as will be discussed later in this testimony, Staff believes the Company's chosen definition of installation performance is inappropriate and results in an understatement of service quality performance failures.

The Company barely made the "Operator Speed of Answer - Intercept" measure for the year in 1995, failing the standard 4 months. It also failed the same standard once in 1996 and three times in 1997. The "Trouble Reports Per 100 Lines" measure was missed twice in 1995, four times in 1996, and once in 1997. Again, the Company's performance

from January 1995 through September 2000 is shown on Attachment 8.01, with monthly and annual failures shaded.

Installation Definition and SBC/Ameritech Illinois' Performance

Q. What has been the Company's reported performance for installation over the life of the alternative regulation plan?

A. The Company has reported little difficulty in meeting the 90% installation in five days per Code Part 730, as well as the 95.44% installation in five days per the alternative regulation plan in Docket 92-0448/93-0239 (Consol.), as shown in Attachment 8.01.

Q. Why is installation performance an issue in this proceeding?

A. Staff has learned that the Company has applied an inappropriate definition of installation performance. The wording in Illinois Administrative Code Part 730.540(a), which is the foundation for the performance benchmarks in the alternative regulation plan, states the following about installation requests:

"The local exchange carrier shall complete 90% of its regular service installations within five working days after the receipt of the application, unless a later date is requested by the applicant."

I do not believe the term "regular service installations" should be construed to mean vertical services such as Caller ID or Call Forwarding. I believe "regular service installations" should relate to the provisioning of regular telephone service, i.e., dial tone.

164 **Q. Why do you believe that the Company has applied an inappropriate**
165 **definition?**

166 A. To me, the term "regular service installation" means regular dial tone service - i.e.,
167 either the installation or turning on of telephone service. Vertical features, such as Caller ID
168 or Call Forwarding, are supplemental, or added features to dial tone service. I would
169 consider them a "change" order.

170
171 **Q. Do you have any other reason to believe the Company has applied an**
172 **inappropriate definition of installation?**

173 A. I have researched the history of service quality standards in this state, and learned
174 that installation performance was first included as a standard in the Second Amending
175 Order in Docket 55472, which modified General Order 197 (telephone standards) on
176 November 20, 1974, as follows:

177 "Section 611 - Installation Requests

178 1. The telephone company shall normally complete 90% of its **regular service**
179 **(business and residence 1, 2, and 4 party service) installations** within five
180 working days. The interval commences with the receipt of application unless a
181 later date is requested by the applicant, and when all tariff requirements related
182 thereto have been complied with. Whenever, due to company reasons, the
183 completion rate falls below 82% within five working days for three consecutive
184 months, the company shall report to the Commission." (emphasis added).

185
186 This wording is significant because, parenthetically, it defines the basis for the term
187 "regular service installations."

188
189 **Q. Why do you say it parenthetically defines the basis of the term regular**
190 **service installations?**

191 A. The reference to “business and residence 1, 2, and 4 party service,” indicates that
192 “regular service installations” should be considered to be provisioning business or
193 residential single/party lines. It clearly does not contemplate vertical services, which did not
194 become a product until the early 1990’s, well after the 1974 date of the Second Amending
195 Order.

196
197 **Q. What else do you think is significant about the installation definition from**
198 **the Second Amending Order in Docket 55472?**

199 A. It means to me that somewhere between the early 1990’s (inception of vertical
200 services) and now, the Company both singularly and arbitrarily decided to add vertical
201 services to their reporting of “regular service installations” performance data to this
202 Commission.

203
204 **Q. Do you have any other reason to believe the Company has applied an**
205 **inappropriate definition of installation?**

206 A. Yes. I have contacted representatives from Verizon (formerly GTE), Consolidated
207 Communications, and Frontier to learn how they define and report installation orders. In
208 short, none of these other Illinois local exchange companies include vertical features in their
209 installation data compiled and reported to the Illinois Commerce Commission.

210
211 **Q. What is the impact of the Company utilizing an inappropriate definition of**
212 **“regular service installation?”**

A. Whereas the Company reports that it is successful in meeting the minimum service requirements under Code Part 730 or alternative regulation, the Company, in fact, is failing them. Attachment 8.04 more accurately illustrates the Company's performance at installing "dial tone" type service by eliminating vertical services from the calculation. As shown in Attachment 8.04, the Company averaged more than 5 days for "dial tone" installation throughout the January 1999 through September 2000 time frame. Moreover, the Company's installation trend has been steadily worsening to the point that September 2000 "dial tone" installations averaged over 10 days.

Q. How should this reporting disparity be resolved?

A. Information about "dial tone" type performance prior to 1998 is unavailable. If the Commission agrees that SBC/Ameritech Illinois' definition of "regular service installation" is inappropriate, the Company has likely missed the "Q" component for installation over the life of the plan, and should experience a corresponding -.25% adjustment to the formula over the life of the current plan. Per SBC/Ameritech Illinois response to data request SSM008, there should be a cumulative reduction of \$29,578,729 in rates.

Q. Is Staff addressing definition problems in any other proceeding?

A. Other than addressing the issue in this proceeding, Staff requested and the Commission opened Docket 00-0596, which is a rulemaking proceeding addressing 83 Ill. Adm. Code Part 730, Standards of Service For Local Exchange Telecommunications Carriers. Among other things, Staff intends to review the definitions of measurements to ascertain that all parties are measuring performance in the same manner.

Regarding installation specifically, Staff will recommend to the Commission that vertical services not be included in the installation calculation, and to incorporate subsequent additional lines as regular installations.

Q. Do you have any other recommended changes to the current alternative regulation service quality plan?

A. Yes. Three of the eight standards do not appear to be viable in the context of the new alternative regulation plan. I do not think “% Dial Tone Speed Within 3 Seconds,” “Operator Speed of Answer - Intercept,” or “Trunk Groups Below Objective” have proven to be as useful as other new measures of Company performance recommended by Ms. Jackson. The “Operator Speed of Answer - Intercept” standard has been deleted from the recently revised Code Part 730, and dial tone speed and trunk groups have not been problems in the history of the current alternative plan.

Service Quality Penalties Made By SBC/Ameritech Illinois

Q. What service quality penalties has the Company faced in Illinois during the alternative regulation plan?

A. The Company has faced reductions in its annual alternative regulation reconciliation due to its out of service problem, which was figured into the formula as the service quality, or “Q” component. Mathematically, the formula was reduced by

-25% for each of the eight measures failed per calendar year. Application of the Q component has produced the following reductions per year:

1996 - \$4.064 million
1997 - \$4.225 million
1998 - \$2.325 million
1999 - \$2.613 million
2000 - None

Q. Have these amounts impacted the Company's service quality behavior?

A. No. In fact, in Docket 98-0555, the Company's witness confirmed that it would cost the Company more money to fix the out of service problem than the alternative regulation formula was reducing their revenue. Mr. Gebhardt confirmed on cross that it would cost approximately \$30 million annually for the Company to fix its out of service problem. (Docket 98-0555, Tr. at 817).

Q. How was the issue addressed in the merger proceeding?

A. As noted in Condition 23, the Company stands to face a \$30 million penalty for failure to meet the out of service standard in calendar year 2000. I am certain that the Company is going to miss the out of service standard in calendar year 2000, which indicates that \$30 million penalty is still insufficient incentive for the Company to provide acceptable service. It also concerns me that the merger conditions may end three years after the merger order; without even the \$30 million penalty, the Company will have significantly less incentive to provide acceptable levels of service quality.

Q. What should the Commission do in this order to facilitate adequate levels of service quality?

A. Generally, the penalties have to be clear, meaningful, and progressive. There must be no room for argument about definition. The penalties must be adequate to provide no monetary incentive to the Company to fail. The penalties, whether based on customer-specific or benchmark performance, must be progressive, increasing with successive failures until the Company has no economic choice but to provide adequate levels of service quality.

Specifically, Ms. Cindy Jackson of Staff proposes penalty mechanisms that I believe meet these general criteria.

WHOLESALE SERVICE QUALITY

History of Wholesale Performance Measures

Q. Will you please describe the relationship between retail service quality and wholesale service quality?

A. Wholesale service quality can be defined as the quality of service SBC/Ameritech Illinois (an incumbent local exchange carrier or "ILEC") provides to competitive local exchange carriers ("CLECs"). For most CLECs, their ability to provide telecommunications service requires that they purchase access to some or all of an ILECs facilities. Accordingly, the quality of service an ILEC provides to the CLEC directly impacts the quality of service a CLEC provides to its own end user customer.

Q. What level of service should an ILEC provide to a CLEC?

A. An ILEC should provide wholesale service to a CLEC in the same manner that it would provide service to its own end user customers. In effect, wholesale service should be provided on a nondiscriminatory basis, thereby providing a CLEC a meaningful opportunity to compete.

Q. What if parity of service is not possible, i.e., a measure is not performed by an ILEC for itself?

A. Then an appropriate benchmark measurement must be developed, again providing CLECs a meaningful opportunity to compete.

Q. Has anything been done in Illinois to implement a wholesale performance measure program for CLEC customers of SBC/Ameritech Illinois?

A. Yes. Condition 30 in Docket 98-0555, the SBC/Ameritech Illinois merger case, ordered a process to develop and institute wholesale performance measures.

Q. Will you please describe the process ordered in Condition 30?

A. Condition 30 ordered a collaborative effort among SBC/Ameritech Illinois, CLECs and Staff, which began meeting in January 2000, with meetings held monthly since then. The collaborative process was ordered to give SBC/Ameritech Illinois, CLECs, and Staff the opportunity to meet and discuss issues relative to performance measures. The Commission ordered that the collaborative process take the 122 performance measures developed in the Texas 271 review and make them applicable to Illinois. The Commission also ordered that parity be the appropriate standard where possible, and where not possible, to adopt benchmark measures as an alternative. Condition 30 also states that the maximum annual penalty for providing inadequate wholesale service quality that SBC/Ameritech Illinois would face is \$90 million.

Q. What is the status of the Condition 30 collaborative process?

A. The collaborative meetings have occurred monthly in Chicago since January 2000, and have been very successful in adapting the 122 performance measures into primarily

336 parity-based measures. Only one issue, regarding Firm Order Confirmations, had gone to
337 hearing - in Docket 00-0238 - but I believe the parties have reached a mutually agreeable
338 position and this hearing will be closed out.

339 It is my understanding that Focal, AT&T, DSLNet, Rhythms, and TCG have
340 amended their interconnection agreements, thereby incorporating the results of the
341 performance measure collaborative. The collaborative meeting on October 17-18, 2000,
342 failed to resolve the remedy issue, which will likely go to a formal proceeding in November.

343
344 **Q. Have any payments for non-performance been paid by SBC/Ameritech**
345 **Illinois to either CLECs (Tier 1) or the State of Illinois (Tier 2)?**

346 A. Yes, SBC/Ameritech Illinois has made two Tier 2 payments thus far. On September
347 18, 2000, SBC/Ameritech Illinois paid \$705,500 to the State of Illinois for non-performance
348 relative to 11 measures for the months of May, June, and July, 2000. On October 20, 2000,
349 SBC/Ameritech Illinois paid \$810,500 to the State of Illinois for non-performance relative to
350 14 measures for the months of June, July and August 2000.

351 Also in October 2000, SBC/Ameritech Illinois paid \$121,900 as a Tier 1 amount to
352 CLECs based on non-performance in the month of August 2000. This dollar amount will
353 increase for the month of August 2000 when submitted interconnection agreement
354 amendments are approved by the Illinois Commerce Commission.

Wholesale Performance Measure Recommendation

Q. Why are you addressing the issue of wholesale service quality in this proceeding?

A. I recommend wholesale performance measures be included in this proceeding to clearly survive the three year time limit of Condition 30 in Docket 98-0555. While the issue of a remedy plan remains contentious, Condition 30 has been a successful collaborative venture between SBC/Ameritech Illinois, CLECs, and Staff. The problem, from my perspective, is that Condition 30 may arguably have a date after which it is no longer in effect. In Docket 98-0555, the Order states:

“Except where other termination dates are specifically established, all conditions set out below shall cease to be effective and shall no longer be binding in any respect three years after the Merger Closing Date.” (Order, p. 237).

While there is other language in the Order that may arguably indicate that Condition 30 does not end three years after the Merger Closing Date, I believe the Commission has an opportunity in this proceeding to prevent any potential misunderstanding in the future.

Q. What do you propose in this proceeding?

A. The Company undoubtedly understands that alternative regulation is a privilege and not a right. Accordingly, I recommend that the Commission institute a wholesale service quality plan that would start in October 2002, clearly surviving the “three years after Merger Closing Date” limitation that may apply to Condition 30.

The wholesale service quality plan I am recommending would use the same business rules and remedy plans for key measurements as defined and modified by the

Condition 30 collaborative effort and any resulting formal proceedings. The key measurements would be limited in number - see Attachment 8.05 for an example of key measurements, and Attachment 8.06 for SBC/Ameritech Illinois' performance relative to those key measurements for the last six months - and would be modified in an annual collaborative meeting facilitated by the Telecommunications Division of the Illinois Commerce Commission.

Q. Why are you proposing limiting the program to "key measures"?

A. The recommendation is made for administrative ease. I anticipate that many performance measure issues will "shake out" between now and October 2002, thereby reducing the need to review hundreds or thousands of performance measures and submeasures.

Q. What if other parties, such as CLECs, object to the concept of limiting the program to key measures in October 2002?

A. It is my expectation that all CLECs will have an opportunity to incorporate Condition 30's performance measures and associated remedies into their interconnection agreements by October 2002. Accordingly, I would anticipate that the key measures I am recommending would pertain only to Tier 2, or payments made to the State of Illinois.

However, if other parties object to the adoption of key measures for Tier 2 payments, I would agree to adopt the complete set of performance measures as they stand now and to be modified through collaborative effort over the next two years.

404 **Q. How long do you believe wholesale performance measures should be in**
405 **effect?**

406 A. They should be in effect as long as SBC/Ameritech Illinois has an alternative
407 regulation plan, and as long as it is necessary for this Commission to ascertain that
408 SBC/Ameritech Illinois is unable to provide discriminatory service to CLECs.

409
410 **Q. Do you have any thoughts about the \$90 million annual penalty cap ordered**
411 **in Condition 30?**

412 A. I propose that, in this proceeding, the Commission accept the penalty cap adopted
413 in any formal proceeding resulting from the Condition 30 effort.

414
415 Conclusion

416
417 **Q. Does that conclude your testimony?**

418 A. Yes.

Company 1995 Service Quality Measurements

Performance Measure	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year End
% Installation Within 5 Days BM < 95.44%	99.9	99.9	99.9	99.9	99.5	99.6	99.2	98.7	98.3	98.3	98.4	98.3	99.2
Trouble Reports per 100 Lines BM > 2.66	2.30	1.71	2.24	2.34	2.68	2.58	2.64	3.18	2.11	2.26	2.66	1.91	2.38
% Out of Service Over 24 Hours BM > 5.0%	14.0	5.0	4.5	7.6	10.9	12.0	13.6	30.9	13.6	12.9	26.6	19.0	14.9
% Dial Tone Speed - 3 Sec. BM < 96.8%						100						99.9	100
Operator Speed - Toll & Assist. BM > 3.6 Sec.	2.7	2.7	2.8	3.0	3.5	3.1	3.3	3.0	2.6	2.9	2.9	2.7	2.9
Operator Speed - Information BM > 5.9 Sec.	4.3	4.5	4.2	4.6	4.7	4.3	5.3	4.8	4.5	4.6	4.8	4.7	4.6
Operator Speed - Intercept BM > 6.2 Sec.	6.1	5.8	5.8	5.7	5.6	5.9	13.9	8.8	6.6	7.1	1.2	0.3	6.1
Trunk Groups Below Objective BM - > 4	0	0	0	0	2	1	0	0	0	0	0	0	3

Company 1995 Service Quality Measurements

Note: Shaded boxes equal failure.

Company 1996 Service Quality Measurements

[illegible]

Company 1996 Service Quality Measurements

Note: Shaded boxes equal failure.

Company 1997 Service Quality Measurements

[illegible]

Company 1997 Service Quality Measurements

Note: Shaded boxes equal failure.

Company 1998 Service Quality Measurements

Performance Measure	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year End
% Installation Within 5 Days BM < 95.44%	98.0	97.9	97.1	97.6	97.8	97.3	97.3	97.1	96.6	96.8	97.4	97.4	97.3
Trouble Reports per 100 Lines BM > 2.66	1.82	1.44	2.17	1.83	1.83	2.02	1.93	1.97	1.71	1.70	1.51	1.28	1.78
% Out of Service Over 24 Hours BM > 5.0%	21.4	21.4	19.3	5.3	6.5	10.9	14.1	24.6	18.9	8.6	8.5	4.6	13.9
% Dial Tone Speed - 3 Sec. BM < 96.8%						100						100	100
Operator Speed - Toll & Assist. BM > 3.6 Sec.	2.4	2.8	3.3	2.7	3.0	3.2	2.6	3.1	3.1	2.4	2.9	2.9	2.9
Operator Speed - Information BM > 5.9 Sec.	4.8	4.8	4.8	4.5	5.3	5.2	5.3	5.0	5.0	5.2	5.3	5.7	5.0
Operator Speed - Intercept BM > 6.2 Sec.	2.1	1.6	1.0	0.7	2.9	0.7	1.3	1.1	1.8	0.9	0.8	1.8	1.4
Trunk Groups Below Objective BM - > 4	0	0	1	0	0	0	0	0	0	0	0	0	1

Note: Shaded boxes equal failure.

Company 1999 Service Quality Measurements

[illegible]

Company 1999 Service Quality Measurements

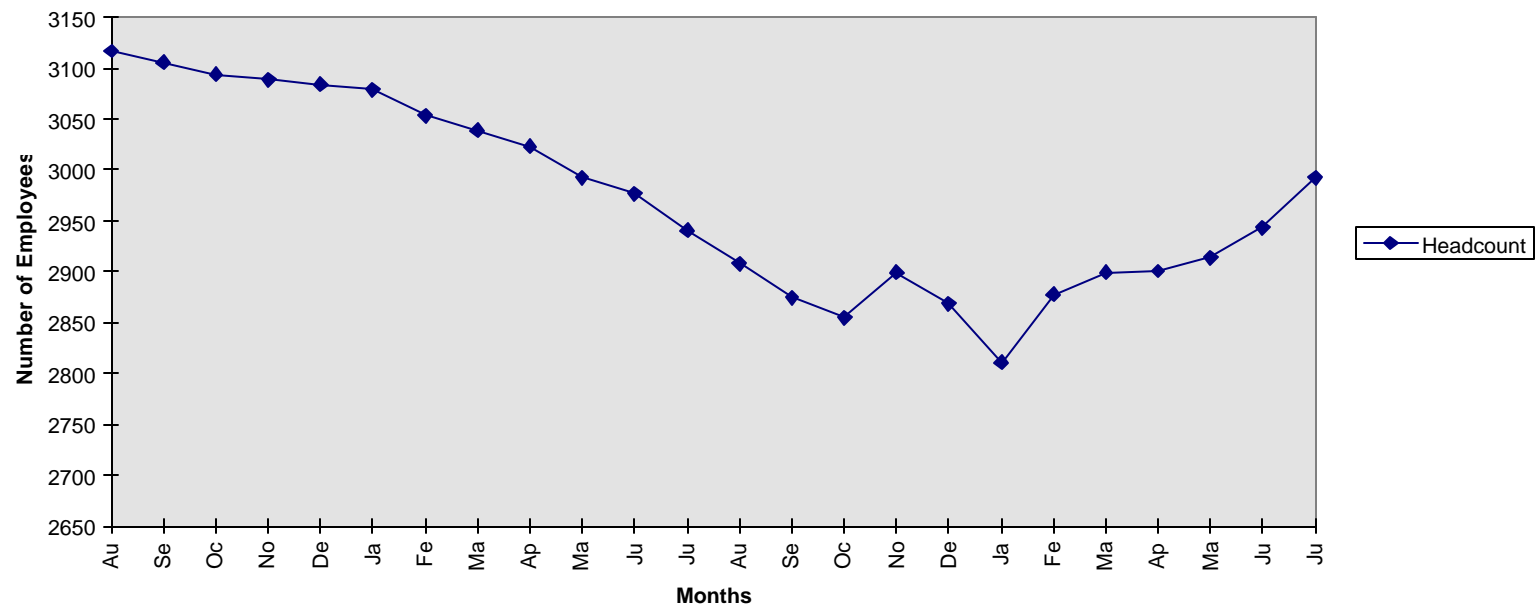
Note: Shaded boxes equal failure.

Company 2000 Service Quality Measurements

Performance Measure	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
% Installation Within 5 Days BM < 95.44%	97.8	97.6	97.2	97.2	96.2	96.5	97.7	98.4	98.0				97.4
Trouble Reports per 100 Lines BM > 2.66	1.41	1.55	1.74	1.76	2.06	2.13	1.93	1.97	1.94				1.83
% Out of Service Over 24 Hours BM > 5.0%	3.7	4.2	3.8	4.4	8.0	13.4	4.4	15.2	37.0				11.4
% Dial Tone Speed - 3 Sec. BM < 96.8%						100							99.3
Operator Speed - Toll & Assist. BM > 3.6 Sec.	2.6	3.2	3.2	3.0	3.2	2.9	3.1	2.9	3.2				3.0
Operator Speed - Information BM > 5.9 Sec.	4.8	4.5	4.9	5.0	5.1	5.4	5.4	5.0	5.3				5.0
Operator Speed - Intercept BM > 6.2 Sec.	0.8	0.7	0.7	0.9	2.4	2.0	4.0	2.0	1.4				1.5
Trunk Groups Below Objective BM - > 4	0	0	0	0	0	1	1	1	N/A				3

Note: Shaded boxes equal failure.

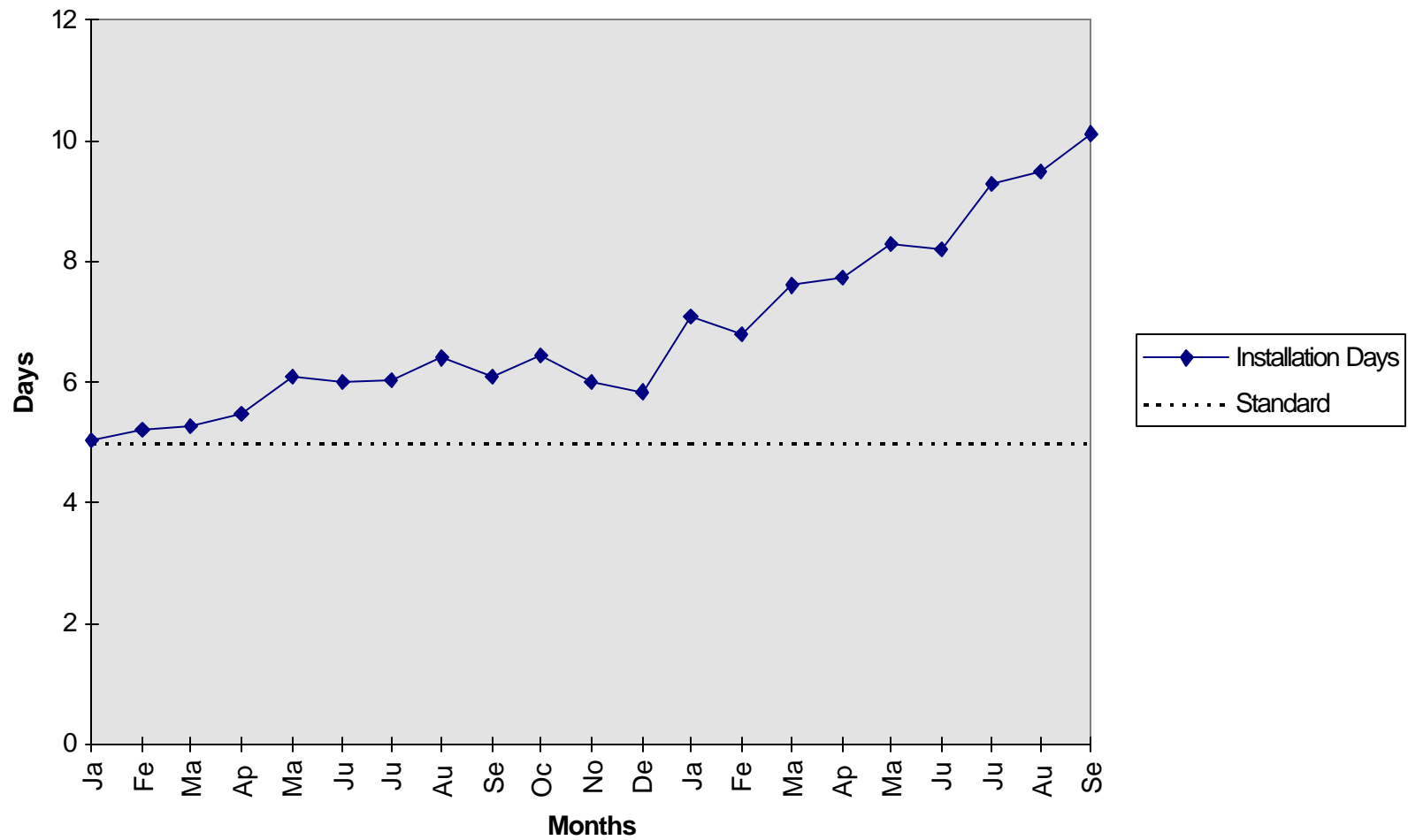
**Illinois Installation and Repair
Field Technician Headcount
August 1998 - July 2000**



Out Of Service > 24 Hours Problem Chronology of Staff Efforts

Timeframe/Docket Number	Description
October 2, 1995	Staff Meeting with Company representatives in Hoffman Estates
November 17, 1995	Staff Meeting with Company representatives in Springfield
January 17, 1996	Staff Meeting with Company representatives in Springfield
96-0138	Annual Filing
96-0172	Annual Filing
96-0178	CUB Complaint, Company Service Quality
97-0157	Annual Filing
97-0171	Ameritech Illinois Metro and Centel Merger
97-0675	Ameritech Illinois Metro and Illinois Bell Telephone Merger
98-0259	Annual Filing
98-0453	Code Part 730 Rulemaking
98-0555	SBC/Ameritech Illinois Merger
October 1998	Staff requested information about OOS>24
December 1998	Staff initiated monthly meetings with Company personnel, meeting in Springfield when metric was missed
98-0252	Alternative regulation review
June 28, 2000	Staff reinitiated monthly meetings with Company operational personnel
July 18, 2000	Staff meeting with Company operational personnel
August 22, 2000	Staff meeting with Company operational personnel
September 27, 2000	Staff meeting with Company operational personnel

**SBC/Ameritech Dial Tone Installation Performance
January 1999 through September 2000**



SBC/Ameritech Illinois Proposed Wholesale Service Quality Measurements

1. % Firm Order Confirmations Returned Within "X" Hours (PM 5)
 - ?? Manually Submitted - Residential and Business < 24 Hours
 - ?? Electronically Submitted - Residential and Business < 5 Hours
 - ?? Electronically Submitted - UNE Loop (1-49 loops) < 5 Hours
2. % Mechanized Completions Returned Within 1 Hour of Completion In Ordering System (PM 7)
 - ?? Resale and UNE
3. % of Rejected Orders (PM 9)
4. Order Process % Flow Through (PM 13)
UNE and Resale POTS
5. Billing Accuracy (PM 14)
6. LSC Average Speed of Answer (seconds) (PM 21)
Resale and UNE
7. LOC Average Speed of Answer (seconds) (PM 24)
Resale and UNE
8. Mean Installation Interval (PM 27)
POTS Residential (days)
POTS Business (days)
UNE
9. % Ameritech Caused Missed Due Dates (PM 29)
POTS Residential (days)
POTS Business (days)
UNE
10. Average Installation Interval - DSL (PM 55.1)
Loop Requiring Conditioning
Loop Requiring No Conditioning
11. Average Response Time For Loop Make-up Information (PM 57)

SBC/Ameritech Illinois Proposed Wholesale Service Quality Measurements

12. % Missed Repair Commitments (PM 38)
Residence Dispatch
Business Dispatch
UNE Dispatch
13. Average Receipt to Clear Duration - POTS (PM 39)
Resale Residential Dispatch Out of Service (Hours)
Resale Business Dispatch Out of Service (Hours)
UNE
14. % Out of Service < 24 Hours (PM 40)
POTS Residential
POTS Business
UNE
15. % Repeat Reports (PM 41)
POTS Residential
POTS Business
UNE
16. % of Trunk Blockage (PM 70)
SBC/Ameritech Tandem to CLEC End Office
17. % Accuracy for 911 Database Updates (PM 103)
18. % DA Database Accuracy for Manual Updates (PM 112)
19. % Missed Collocation Due Dates (PM 107)
Physical
Virtual
20. % of Premature Disconnects (Coordinated Cutovers) (PM 114)
LNP With Loop
21. % of SBC/Ameritech Caused Delayed Coordinated Cutovers (PM 115)
LNP w/UNE Loop > 60 Minutes

SBC/Ameritech Illinois Wholesale Service Quality Key Indicators March 2000 Through August 2000

Measure Number	Measure Description	March 2000	April 2000	May 2000	June 2000	July 2000	August 2000
5	% FOCs Returned Within "X" Hours - Manual - Res. & Bus < 24	94.0	98.8	99.2	98.7	99.3	98.8
5	% FOCs Returned Within "X" Hours - Elec - Res & Bus < 24	96.0	99.0	98.9	97.9	99.1	93.0
5	% FOCs Returned Within "X" Hours - Elec - UNE Loop 1-49 <24	61.0	51.0	33.2	57.6	86.9	90.1
7	% Mech Completions Returned W/in 1 Hour - Resale	n/a	n/a	91.3	82.7	87.6	52.7
7	% Mech Completions Returned W/in 1 Hour - UNE	n/a	n/a	98.5	95.6	97.8	96.1
9	Percent Rejects	19.6	21.8	25.2	25.6	26.0	23.6
13	Order Process Percent Flow Through - UNE Loops	28.3	37.8	15.6	13.3	18.1	22.4
13	Order Process Percent Flow Through - Resale	67.6	75.0	76.6	85.9	97.3	99.6
14	Billing Accuracy - Resale Monthly Recurring/Nonrecurring	n/a	0	0	0	0	0
21	Local Service Center Average Speed of Answer - Resale	11	12	12	840	126	22
21	Local Service Center Average Speed of Answer - UNE	34	49	49	703	94	22
24	Local Operations Center Average Speed of Answer	26	58	58	28	15	19
27	Mean Installation Interval - POTS - Res - FW (Days)	9.6	10.0	11.7	11.3	14.4	12.4
27	Mean Installation Interval - POTS - Bus - FW	6.3	6.0	5.7	6.5	6.9	6.0

SBC/Ameritech Illinois Wholesale Service Quality Key Indicators March 2000 Through August 2000

27	Mean Installation Interval - UNE - No FW	2.3	2.8	2.3	3.5	.8	.7
29	% AIT Caused Due Dates - POTS - Res - FW	14.4	12.3	16.6	14.7	23.4	23.5
29	% AIT Caused Due Dates - POTS - Bus - FW	8.9	8.8	8.4	13.3	15.2	11.7
29	% AIT Caused Due Dates - UNE - No FW	n/a	n/a	n/a	n/a	n/a	0
38	% Missed Repair Commitments - POTS - Res - Dispatch	6.8	8.0	12.6	18.2	9.1	17.1
38	% Missed Repair Commitments - POTS - Bus - Dispatch	8.7	7.6	12.4	14.9	11.0	18.8
39	Receipt to Clear Duration - POTS - Res - Dispatch - Affecting - Hours	104.1	88.7	138.4	189.5	118.6	149.3
39	Receipt to Clear Duration - POTS - Bus - Dispatch - Affecting - Hours	75.5	65.8	116.3	115.9	84.8	114.1
40	Percent Out of Service (OOS) < 24 Hours - POTS - Residence	95.5	94.7	89.2	80.5	92.7	78.5
40	Percent Out of Service (OOS) < 24 Hours - POTS - Business	92.2	92.7	86.7	78.9	91.8	76.0
41	Percent Repeat Reports - POTS - Business	8.3	11.8	10.0	10.8	11.2	11.3
41	Percent Repeat Reports - POTS - Residence	6.7	6.8	8.0	8.3	9.3	6.9
55.1	Average Installation Interval - DSL - With Conditioning	25.8	21.1	37.4	30.9	38.0	21.2
55.1	Average Installation Interval - DSL - Without Conditioning	7.2	7.2	8.7	10.1	11.1	10.2
57	Average Response Time - Loop	45.6	49.6	64.1	81.4	n/a	70.9

SBC/Ameritech Illinois Wholesale Service Quality Key Indicators March 2000 Through August 2000

	Makeup Information - ADSL						
57	Average Response Time - Loop Makeup Information - Other DSL	45.8	97.7	n/a	n/a	n/a	n/a
70	Trunk Blockage - AIT Tandem to CLEC End Office	.0010	.0002	n/a	n/a	n/a	n/a
103	Percent Accuracy For 911 Database Updates	n/a	n/a	0	n/a	n/a	n/a
107	Percent Missed Collocation Due Dates - Physical	0	0	0	0	0	0
107	Percent Missed Collocation Due Dates - Virtual	0	0	0	0	0	0
112	Percent Directory Assistance Database Accuracy - Manual	n/a	n/a	n/a	98.5	99.3	100
114	Percentage Premature Disconnects - LNP With Loop	62.7	48.2	48.2	0.3	0	0
115	Percentage of AIT Caused Delayed Coor. Cuts - LNP W/Loop	7.6	7.3	7.3	2.8	0	0